

EXHIBIT A

ARCHER & GREINER

ATTORNEYS AT LAW
1025 LAUREL OAK ROAD
VOORHEES, NEW JERSEY 08043
(856-795-2121)

DAVID W. CARICKHOFF
ARCHER & GREINER
300 DELAWARE AVE., SUITE 1100
WILMINGTON, DE 19801

Invoice Number: 4290495
Invoice Date: 06/15/23
Client Number: CAR493
Matter Number: CAR493.97021

For Professional Services Rendered Through 05/31/2023

Task Summary

Time Summary by Task

Code	Description	Hours	Value
1	ARCHER GREINER FEE/EMPLOYMENT APPLICATIONS	2.90	892.50
10	FINANCING ISSUES (DIP FINANCING/CASH COLLATERAL)	19.30	9,052.50
12	SALE OF ASSETS	11.40	5,325.00
13	STAY RELIEF ISSUES	2.00	990.00
17	HEARINGS - PREPARATION AND ATTENDANCE	3.00	942.00
18	OTHER LITIGATION	0.30	142.50
3	EXECUTORY CONTRACTS AND UNEXPIRED LEASES	2.50	1,204.50
6	CASE ADMINISTRATION	2.00	984.00
TOTAL FEES		43.40	19,533.00

Expense Summary by Task

Code	Description	Expenses
E101	COPYING	5.40
E107	DELIVERY SERVICES/MESSENGERS	313.66
TOTAL DISBURSEMENTS		319.06
TOTAL INVOICE		19,852.06

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 2

Date	Description	Task	Hours	Name	Fees
07/25/22	Email C. Hansen re Archer employment application	1	0.10	B. J. Hall	46.50
07/26/22	Review and revise draft Archer employment application	1	0.50	B. J. Hall	232.50
07/26/22	Draft A&G Retention Application.	1	1.30	C. E. Hansen	292.50
08/11/22	Finalize, file, and coordinate service of Archer employment application	1	0.20	B. J. Hall	93.00
08/12/22	Draft, file, and coordinate service of amended notice of Archer employment application	1	0.20	B. J. Hall	93.00
08/26/22	Draft and e-file CNO re: A&G Retention Application.	1	0.40	C. E. Hansen	90.00
08/29/22	Serve A&G Retention Orders.	1	0.20	C. E. Hansen	45.00
ARCHER GREINER FEE/EMPLOYMENT APPLICATIONS TOTAL				2.90	892.50

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 3

Date	Description	Task	Hours	Name	Fees
07/06/22	Call with A. Halperin re case (.4); second call with A. Halperin (.2); discuss case and next steps with Trustee (.2)	10	0.80	B. J. Hall	372.00
07/07/22	Call with A. Halperin re proposed sharing arrangement (.2) and email Trustee re same (.1)	10	0.30	B. J. Hall	139.50
07/08/22	Call with A. Halperin re sharing arrangement (.2); update Trustee re same (.1); draft and circulate proposal (.2)	10	0.50	B. J. Hall	232.50
07/11/22	Call with A. Halperin re sharing arrangement (.3); discuss same with Trustee (.1)	10	0.40	B. J. Hall	186.00
07/11/22	Submit request for Vermont UCC search.	10	0.10	C. E. Hansen	22.50
07/12/22	Review and comment on counterproposal from North Mill Capital	10	0.40	B. J. Hall	186.00
07/12/22	Call with A. Halperin re sharing arrangement (.2); update Trustee re same (.1); draft and circulate proposal (.2)	10	0.50	B. J. Hall	232.50
07/12/22	Call with Trustee re North Mill sharing	10	0.20	B. J. Hall	93.00
07/12/22	Call with A. Halperin re North Mill sharing	10	0.50	B. J. Hall	232.50
07/12/22	Follow up call with Trustee re North Mill sharing	10	0.10	B. J. Hall	46.50
07/12/22	Emails with A. Halperin re North Mill sharing	10	0.10	B. J. Hall	46.50
07/12/22	Review and circulate updated email from A. Halperin re North Mill sharing	10	0.20	B. J. Hall	93.00
07/12/22	Draft response to A. Halperin (.4) and follow up emails with Trustee re sharing (.1)	10	0.50	B. J. Hall	232.50
07/13/22	Call to A. Halperin re sharing arrangement (.2); follow up call with A. Halperin re sharing and requests for information (.3)	10	0.50	B. J. Hall	232.50
07/13/22	Draft proposed order re cash collateral and sharing arrangement	10	2.30	B. J. Hall	1,069.50
07/13/22	Call with (.2) and emails to (.1) D. Carickhoff re sharing arrangement and related matters	10	0.30	B. J. Hall	139.50
07/13/22	Draft email to A. Halperin re sharing arrangement (.4); follow up emails re same (.1)	10	0.50	B. J. Hall	232.50
07/20/22	Call with A. Halperin re receivables and related matters (.3); follow up emails with A. Halperin (.1) and with the Trustee (.1)	10	0.50	B. J. Hall	232.50
07/21/22	Follow up email to Debtors' principals re requests	10	0.10	B. J. Hall	46.50

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 4

Date	Description	Task	Hours	Name	Fees
07/21/22	Call with A. Halperin re status of information requests and other matters	10	0.30	B. J. Hall	139.50
07/21/22	Call to M. Busenkell, Debtors' counsel	10	0.10	B. J. Hall	46.50
07/21/22	Review and revise draft cash collateral order and email to A. Halperin	10	0.30	B. J. Hall	139.50
07/21/22	Review and revise Order re cash collateral and sharing agreement	10	1.20	D. W. Carickhoff, Jr.	774.00
07/22/22	Draft cash collateral motion	10	1.00	B. J. Hall	465.00
07/22/22	Respond to A. Halperin re information requests	10	0.10	B. J. Hall	46.50
07/25/22	Emails with S. Alves and A. Halperin re A/R aging and portal access	10	0.20	B. J. Hall	93.00
07/26/22	Call with S. Alves, Geneseas, re information requests	10	0.10	B. J. Hall	46.50
07/26/22	Multiple emails with S. Alves and A. Halperin re information requests	10	0.20	B. J. Hall	93.00
07/28/22	Email A. Halperin re draft cash collateral and sharing order, A/R collections, and rejection motion	10	0.10	B. J. Hall	46.50
08/04/22	Call with A. Halperin, counsel to North Mill Capital, re A/R collections and proposed sharing arrangement	10	0.60	B. J. Hall	279.00
08/04/22	Email Trustee re update on A/R collections and proposed sharing arrangement	10	0.10	B. J. Hall	46.50
08/05/22	Call with Trustee re A/R collections and comments to cash collateral and sharing order	10	0.30	B. J. Hall	139.50
08/07/22	Revise draft cash collateral and sharing order	10	0.50	B. J. Hall	232.50
08/09/22	Call with A. Halperin re cash collateral and sharing arrangement	10	0.60	B. J. Hall	279.00
08/09/22	Review, revise, and circulate draft cash collateral and sharing order	10	0.60	B. J. Hall	279.00
08/09/22	Continue drafting cash collateral motion	10	0.40	B. J. Hall	186.00
08/10/22	Update and circulate draft cash collateral motion and order	10	0.30	B. J. Hall	139.50
08/10/22	Call with A. Halperin re cash collateral and sharing	10	0.30	B. J. Hall	139.50
08/10/22	Email S. Alves following up on information requests	10	0.20	B. J. Hall	93.00

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 5

Date	Description	Task	Hours	Name	Fees
08/11/22	Review and update draft cash collateral and sharing motion per comments from North Mill (.4); finalize, file, and coordinate service of same (.2)	10	0.60	B. J. Hall	279.00
08/11/22	Call with L. Casey re case and cash collateral and sharing arrangement	10	0.10	B. J. Hall	46.50
08/12/22	Review and circulate responses from S. Alves re receivables	10	0.10	B. J. Hall	46.50
08/17/22	Call with L. Casey re cash collateral and sharing arrangement	10	0.20	B. J. Hall	93.00
08/26/22	Review and coordinate submission of CNO for cash collateral and sharing	10	0.10	B. J. Hall	46.50
08/26/22	Draft and e-file CNO re: Cash Collateral Motion.	10	0.30	C. E. Hansen	67.50
08/29/22	Review, circulate, and coordinate service of cash collateral and sharing order	10	0.10	B. J. Hall	46.50
08/29/22	Serve Cash Collateral Order.	10	0.20	C. E. Hansen	45.00
08/30/22	Email exchange with A. Halperin and Trustee re cash collateral and sharing	10	0.20	B. J. Hall	93.00
08/30/22	Call with A. Halperin re cash collateral and sharing	10	0.20	B. J. Hall	93.00
08/31/22	Email exchange with A. Halperin and with Trustee re cash collateral and sharing arrangement	10	0.10	B. J. Hall	46.50
09/06/22	Discuss cash collateral and sharing with Trustee (.1); email exchange with A. Halperin re same (.1)	10	0.20	B. J. Hall	93.00
09/16/22	Emails with A. Halperin and Trustee re collections	10	0.10	B. J. Hall	46.50
09/22/22	Call with A. Halperin re status of A/R collections and related matters	10	0.30	B. J. Hall	139.50
10/08/22	Review docket and respond to A. Halperin re challenge period	10	0.10	B. J. Hall	49.50
03/03/23	Emails with Trustee and Publix's counsel re finalizing A/R settlement	10	0.10	B. J. Hall	49.50

FINANCING ISSUES (DIP FINANCING/CASH COLLATERAL) TOTAL**19.30****9,052.50**

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 6

Date	Description	Task	Hours	Name	Fees
07/19/22	Emails with A. Halperin and with Debtors' principals following up on A/R	12	0.10	B. J. Hall	46.50
07/21/22	Email exchange with A. Halperin re A/R collection	12	0.10	B. J. Hall	46.50
07/21/22	Draft letter to Santa Priscila and BlueFoot re accounts receivable	12	1.50	B. J. Hall	697.50
08/11/22	Call with A. Halperin re Publix receivable follow up	12	0.30	B. J. Hall	139.50
08/11/22	Review and respond to emails with Publix re receivables	12	0.20	B. J. Hall	93.00
08/11/22	Review emails re Nautilus receivable	12	0.10	B. J. Hall	46.50
08/15/22	Follow up on Publix portal access request	12	0.10	B. J. Hall	46.50
08/15/22	Follow up with S. Alves re missing A/R documents	12	0.10	B. J. Hall	46.50
08/16/22	Follow up on Ahold portal and A/R	12	0.20	B. J. Hall	93.00
08/17/22	Call with S. Lieb, counsel to Publix, re receivables (.3); email to A. Halperin, counsel to North Mill Capital, re Publix (.1)	12	0.40	B. J. Hall	186.00
08/23/22	Email exchange with S. Lieb re Publix receivables	12	0.10	B. J. Hall	46.50
08/25/22	Follow up on Publix invoices	12	0.10	B. J. Hall	46.50
08/30/22	Review Publix documents re unpaid invoices and holdback	12	0.30	B. J. Hall	139.50
08/30/22	Call with S. Lieb, counsel for Publix, re A/R	12	0.20	B. J. Hall	93.00
09/08/22	Emails with S. Alves and Publix re invoices	12	0.10	B. J. Hall	46.50
09/09/22	Emails with Publix counsel and outreach to Igloo Exchange	12	0.10	B. J. Hall	46.50
09/14/22	Call with A. Halperin re A/R collections	12	0.40	B. J. Hall	186.00
09/20/22	Email exchange with A. Halperin re A/R collections	12	0.10	B. J. Hall	46.50
09/23/22	Review and circulate updated A/R collection report and update from North Mill	12	0.20	B. J. Hall	93.00
09/23/22	Call with A. Halperin re A/R collections	12	0.10	B. J. Hall	46.50
09/25/22	Email A. Halperin re follow up on A/R collections	12	0.10	B. J. Hall	46.50
10/14/22	Call (.1) and follow up email (.2) to Igloo	12	0.30	B. J. Hall	148.50

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 7

Date	Description	Task	Hours	Name	Fees
Exchange re shipments to Publix					
11/07/22	Call with S. Lieb re Pubix receivable	12	0.20	B. J. Hall	99.00
11/11/22	Call with A. Prescott and J. Woodcock re IP	12	0.20	B. J. Hall	99.00
11/11/22	Initial review of potential IP assets (.4) and email S. Alves requesting information (.1)	12	0.50	B. J. Hall	247.50
11/16/22	Review and respond to email from A. Halperin, counsel to North Mill, re A/R collection	12	0.10	B. J. Hall	49.50
11/16/22	Update Trustee on A/R collection	12	0.20	B. J. Hall	99.00
11/21/22	Email S. Lieb re Publix A/R	12	0.10	B. J. Hall	49.50
11/22/22	Email Ahold re receivable	12	0.20	B. J. Hall	99.00
11/29/22	Follow up on A/R collections	12	0.10	B. J. Hall	49.50
12/02/22	Follow up on A/R collections	12	0.10	B. J. Hall	49.50
01/05/23	Email Trustee re Publix A/R	12	0.10	B. J. Hall	49.50
01/27/23	Draft and circulate Publix A/R settlement	12	0.50	B. J. Hall	247.50
02/13/23	Review and revise Publix draft settlement agreement	12	0.30	B. J. Hall	148.50
02/15/23	Review uncollected A/R (.4) and draft demand letter (.3)	12	0.70	B. J. Hall	346.50
02/16/23	Revise and circulate Publix settlement agreement (.2) and emails re same with S. Lieb, counsel to Publix (.1)	12	0.30	B. J. Hall	148.50
03/14/23	Call with G. Hesse, counsel to Ahold	12	0.10	B. J. Hall	49.50
03/15/23	Research and provided responses to G. Hesse, counsel for Ahold, re prepetition receivable	12	0.80	B. J. Hall	396.00
04/04/23	Finalize, file, and coordinate service of Publix settlement motion	12	0.30	B. J. Hall	148.50
04/11/23	Review update from Ahold re receivable	12	0.10	B. J. Hall	49.50
04/11/23	Call with G. Hesse re Ahold receivable	12	0.30	B. J. Hall	148.50
04/13/23	Review Ahold updates	12	0.20	B. J. Hall	99.00
04/19/23	Review email from Bryan Hall regarding and prepare CNO to Publix 9019 motion. Finalize and efile CNO. Upload order.	12	0.60	A. M. Huber	126.00
05/22/23	Follow up with G. Hesse re Ahold receivable	12	0.20	B. J. Hall	99.00
SALE OF ASSETS TOTAL				11.40	5,325.00

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 8

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 9

Date	Description	Task	Hours	Name	Fees
10/05/22	Discuss with Trustee Boyd stay relief	13	0.10	B. J. Hall	49.50
10/06/22	Draft certification of counsel and proposed order on Boyd stay relief request	13	1.00	B. J. Hall	495.00
10/25/22	Email exchange with B. Dauphin re Boyd stay relief	13	0.10	B. J. Hall	49.50
10/28/22	Email exchange with Y. Moore, Liberty insurance, re Canada lawsuit	13	0.10	B. J. Hall	49.50
10/31/22	Call with Y. Moore, Liberty Mutual, re prepetition lawsuit	13	0.20	B. J. Hall	99.00
11/02/22	Follow up on Canada lawsuit	13	0.10	B. J. Hall	49.50
11/07/22	Follow up on Boyd stay relief request	13	0.10	B. J. Hall	49.50
11/21/22	Finalize, file, and circulate Boyd stay relief stipulation	13	0.20	B. J. Hall	99.00
11/22/22	Review and circulate stay relief order	13	0.10	B. J. Hall	49.50
STAY RELIEF ISSUES TOTAL				2.00	990.00

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 10

Date	Description	Task	Hours	Name	Fees
08/12/22	Draft, file, and coordinate service of amended notice of cash collateral motion	17	0.30	B. J. Hall	139.50
08/16/22	Review and comment on draft hearing agenda and emails re hearing	17	0.10	B. J. Hall	46.50
08/16/22	Draft and e-file NOA Cancelling 8.24.22 Hearing.	17	0.50	C. E. Hansen	112.50
08/17/22	Follow up with chambers re September 6 hearing	17	0.10	B. J. Hall	46.50
08/26/22	Submit hearing binder to chambers	17	0.10	B. J. Hall	46.50
08/29/22	Draft and e-file NOA Cancelling 9.6.22 Hearing.	17	0.60	C. E. Hansen	135.00
04/19/23	Review and submit CNO binder for 9019 motion	17	0.10	B. J. Hall	49.50
04/20/23	Review email from Bryan Hall regarding and effectuate service of Order granting Publix 9019 motion via email. Email to Document Production detailing instructions to effectuate service via first class mail. Prepare, finalize, efile and serve NOA cancelling 5/22/2023 hearing via email. Email to Document Production detailing instructions to effectuate service via first class mail.	17	0.80	A. M. Huber	168.00
04/20/23	Review and coordinate service of order granting 9019 motion (.1); review notice of agenda and related emails with A. Huber and Chambers (.1)	17	0.20	B. J. Hall	99.00
04/20/23	Follow up on settlement and hearing	17	0.20	B. J. Hall	99.00
HEARINGS - PREPARATION AND ATTENDANCE			3.00		942.00
TOTAL					

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 11

Date	Description	Task	Hours	Name	Fees
09/21/22	Call with A. Boxer re Vermont state court litigation	18	0.10	B. J. Hall	46.50
09/21/22	Email A. Boxer re Vermont litigation and the bankruptcy case	18	0.10	B. J. Hall	46.50
04/03/23	Discuss case with Trustee	18	0.10	B. J. Hall	49.50
OTHER LITIGATION TOTAL			0.30		142.50

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 12

Date	Description	Task	Hours	Name	Fees
07/27/22	Draft motion to reject leases and abandon property	3	0.70	D. W. Carickhoff, Jr.	451.50
07/28/22	Review and coordinate filing of motion to reject leases	3	0.20	B. J. Hall	93.00
07/28/22	Finalize lease rejection motion and motion to abandon property	3	0.60	D. W. Carickhoff, Jr.	387.00
07/28/22	E-file and serve Lease Rejection Motion.	3	0.50	C. E. Hansen	112.50
08/15/22	Draft, file and circulate CNO for motion to reject	3	0.20	B. J. Hall	93.00
08/16/22	Coordinate service of Lease Rejection Order.	3	0.30	C. E. Hansen	67.50
EXECUTORY CONTRACTS AND UNEXPIRED LEASES TOTAL				2.50	1,204.50

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 13

Date	Description	Task	Hours	Name	Fees
09/23/22	Call with A. Prescott, creditor's counsel, re case	6	0.20	B. J. Hall	93.00
12/01/22	Prepare for (.2) and participate in (.2) call with S. Alves re case	6	0.40	B. J. Hall	198.00
02/14/23	Call with Trustee re case	6	0.10	B. J. Hall	49.50
04/03/23	Draft Publix 9019 motion	6	0.50	B. J. Hall	247.50
04/11/23	Discuss case status with Trustee	6	0.10	B. J. Hall	49.50
05/16/23	Email exchange with S. Alves re case	6	0.10	B. J. Hall	49.50
05/17/23	Call with Geneseas Brazil re status of case	6	0.50	B. J. Hall	247.50
05/23/23	Respond to email from S. Alves	6	0.10	B. J. Hall	49.50
CASE ADMINISTRATION TOTAL				2.00	984.00

CAR493

CARICKHOFF, DAVID W - CHAPTER 7 TRUSTEE

Invoice Number: 4290495

CAR493.97021

IN RE: GENESEAS HOLDING US LLC - CHAPTER 7
BANKRUPTCY

Page 14

For Charges and Disbursements

Date	Type	Description	Amount
04/20/23		PHOTOCOPYING	27 @ 0.10 \$2.70
04/20/23		PHOTOCOPYING	27 @ 0.10 \$2.70
		ETOTAL* PHOTOCOPYING	\$5.40
07/23/22		VENDOR: UNITED PARCEL SERVICE; INVOICE#: 00005FY328312-1; DATE: 7/23/2022 BHH TO INDUSTRIAL PESQUERA SANTA PRIS	\$143.17
07/23/22		VENDOR: UNITED PARCEL SERVICE; INVOICE#: 00005FY328312-1; DATE: 7/23/2022 BHH TO THE BLUEFOOT SEAFOOD COMPANY	\$143.17
		ETOTAL* DELIVERY SERVICE	\$286.34
07/22/22		VENDOR: FEDERAL EXPRESS CORPORATION; INVOICE#: 7-836-36452; DATE: 7/22/2022 BHH TO LARISSA BASSARAB	\$27.32
		ETOTAL* FEDERAL EXPRESS	\$27.32
		TOTAL DISBURSEMENTS*	\$319.06